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April 1, 2005

The Dow Chemical Company  
Midland, Michigan 48674  
USA

Via Certified Mail 7000 1530 0005 1754 9384

Jim Willis (7405M)  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Diane Sheridan (7405M)  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

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CASRN 542-75-6, 1,3-DICHLOROPROPENE  
PUBLICLY AVAILABLE INFORMATION TO ADDRESS EPA HPV CHALLENGE

Dow is providing publicly available hazard information for the endpoints identified in the EPA HPV Challenge for 1,3-dichloropropene. As indicated to the Agency in previous communications, this substance is a pesticide regulated by FIFRA in the U.S. and is used exclusively as an intermediate to another pesticide. Dow believes these conditions are sufficient to exempt this substance from the EPA HPV Challenge. Nearly five years after our request for exemption of 1,3-dichloropropene from the EPA HPV Challenge, the Agency communicated our request was not accepted. November 11, 2004, Dow sent a letter to EPA stating its commitment to provide publicly available hazard information for the EPA HPV Challenge endpoints.

As described in our request to EPA in 1999, the Reregistration Eligibility Decision (RED), Case 0328, has been publicly available since 1998. The link to the document has been and continues to be available on the EPA website shown below:

<http://cfpub.epa.gov/oppref/rereg/status.cfm?show=rereg>

This document describes the results from the numerous studies on 1,3-dichloropropene which include all the endpoints within the EPA HPV Challenge. Acute, subchronic, chronic/carcinogenicity, developmental, reproductive, mutagenicity, metabolism, dermal absorption and epidemiological information is provided as well as environmental fate, degradation, and ecotoxicity results in terrestrial and aquatic plants and animals.

This information is publicly available and more than satisfies the intent of the EPA HPV Challenge to provide basic health and environmental information.

We request the removal of this substance from EPA's HPV Orphans List and Annex A of the 55<sup>th</sup> ITC Report.

Sincerely,

Linda C. Burgert  
EH&S Product Regulatory Management  
PH: 989-636-1011  
FAX: 989-638-9933  
E-MAIL: [lburgert@dow.com](mailto:lburgert@dow.com)

jt

cc: John Walker, USEPA Headquarters, Washington, DC